

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In the Matter of)	
)	
IN RE: SUBPOENA TO HOSIDEN AMERICA)	Case No.: 07 C 6458
CORPORATION)	Judge Ruben Castillo
HONEYWELL INTERNATIONAL, INC., et al.,)	Magistrate Judge Schenkier
Plaintiffs,)	
)	
v.)	
)	
APPLE COMPUTER, et al.,)	
)	
Defendants.)	

DECLARATION OF SOICHIRO RAI

I, Soichiro Rai, declare under penalty of perjury as follows:

1. I am the Treasurer of Hosiden America Corporation (hereinafter referred to as "Hosiden America"), which has its principal place of business located at 120 East State Parkway Schaumburg, IL 60173.

2. I am one of the individuals responsible for supervising responses to subpoenas served on Hosiden America.

3. I have reviewed the subpoena duces tecum served by Fujifilm Corporation on Hosiden America in the above-captioned cause (the "Subpoena"). As a custodian of records for Hosiden America, I am familiar with the categories of documents sought in the Subpoena.

4. Of the categories of documents requested in the Subpoena, Hosiden America does not retain such documents that are more than seven (7) years old. Consequently, Hosiden America does not have within its ownership or control any documents responsive to Fujifilm's Subpoena, which were limited to the years 1988-1994 (and subsequently further limited to the years 1988-1992 by agreement of Fujifilm's legal counsel).

5. In addition, as reported through Hosiden America's legal counsel to Fujifilm's legal counsel, upon a diligent search of Hosiden America's files, no responsive documents to Fujifilm's Subpoena have been discovered.

6. Hosiden America does not control or have access to documents belonging to Hosiden Corporation, the Japanese parent corporation of Hosiden America (referred to hereafter as "Hosiden Japan").

7. Notwithstanding the foregoing lack of control by Hosiden America over Hosiden Japan's documents, Hosiden Japan has voluntarily advised Hosiden America that Hosiden Japan does not have any documents that are responsive to Fujifilm's Subpoena.

8. Consequently, as previously reported to Fujifilm, Hosiden America does not have any responsive documents to Fujifilm's Subpoena, and in addition, upon information from Hosiden Japan, there are no documents possessed by Hosiden Japan that are responsive to Fujifilm's Subpoena.

I declare under penalty of perjury that the foregoing is true and correct.

Soichiro Rai
Soichiro Rai

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